

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
SOUTHERN DIVISION**

DARRYL ANDERSON, et al.,

Plaintiffs,

v.

PERDUE FARMS, LLC.

Defendant.

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**CIVIL ACTION NO.
1:06-cv-1000-MEF**

NOTICE OF FILING ADDITIONAL CONSENTS TO JOIN

Plaintiffs give notice of filing the attached Notices of Consent to Join executed by EVELETA WILLIAMS, ANGELA JAY, DIANE SAMPLES, ANGELA JOHNSON HAYNES, ULYSSES DICKEY, POLLY MOSLEY, VANESTHER JOHNSON, CERIAL SATCHELL, and DEBRA A. FUDGE, similarly situated employees to Plaintiffs, who likewise are or were subjected to the illegal pay practices at issue, and who wish to join the above captioned lawsuit.

Dated: July 16, 2007

Respectfully submitted,

THE COCHRAN FIRM, P.C.

/s/ Robert J. Camp

ROBERT J. CAMP

BERNARD D. NOMBERG

505 North 20th Street, Suite 825

Birmingham, AL 35203

(205) 930-6900 (Phone)

(205) 930-6910 (Fax)

– and –

Samuel A. Cherry, Jr.

Lance H. Swanner

THE COCHRAN FIRM, P.C.

163 West Main Street

P. O. Box 927

Dothan, AL 36302

(334) 793-1555 (Phone)

(334) 793-8280 (Fax)

CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2007 I electronically filed the above Notice with the Clerk of the District Court using CM/ECF System, which sent notification of such filing to:

Samuel A. Cherry
Attorney for Plaintiff
scherry@cochranfirm.com

Lance Harrison Swanner
Attorney for Plaintiff
lswanner@cochranfirm.com

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James Kelley
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jkelley@morganlewis.com

Sandra Reiss
Attorney for Defendant
Sandra.reiss@odnss.com

Richard B. Celler
Attorney for Plaintiff
Richard@cellarlegal.com

/s/ Robert J. Camp _____
ROBERT J. CAMP

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Eveleta Williams states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of plant]
the facility located in Dothan AL. I worked at this location from
[City/State]
9-6-90 2-29-07 to present.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre-and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this Perdue Farms suit may be brought as a class action covering employees at the Eveleta Williams plant in Dothan AL, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms. If brought as a class
[Name of Plant] (P)
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 24th day of Feb. 2007.
(P)

Eveleta Williams
[PRINT NAME]

Eveleta Williams
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Angela Jay
[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue farms at
[Name of plant]
the facility located in Dothan, AL I worked at this location from
[City/State]
05/18/03 to 5/11/07
[Date] ☒ [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue farms plant in Dothan, AL and
[Name of Plant] [City/State]
possibly other plants owned by Perdue farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 11 day of June, 2007.

Angela Jay
[Signature]

Angela Jay
[Signature]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Diane Samples

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of plant]
the facility located in Dothan, AL. I worked at this location from
[City/State]
9/7/97 to present.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan, AL, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 24 day of February, 2007.

Diane Samples

[PRINT NAME]

Diane Samples

[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Angela Johnson Hagners states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of plant]
the facility located in Dothan Ala. I worked at this location from
[City/State]
5-24-05 to 10-05
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan Ala, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 31 day of May, 2007.

Angela Johnson Hagners
[Signature]

Angela Johnson Hagners
[Signature]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Ulysses Dickey states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of Plant]
the facility located in Dothan, AL. I worked at this location from
Nov. 3, 2003 to Dec. 01, 2004
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan, AL and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9th day of June 2007.
(E)

Ulysses Dickey Jr.
[PRINT NAME]

Ulysses Dickey
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Polly Mosley states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of plant]
the facility located in Dothan, AL. I worked at this location from
[City/State]
1992 to 2007 Present
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan, AL, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 11 day of May, 2007.

Polly Mosley
[Redacted Signature]

Polly Mosley
[Redacted Signature]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Vanesther Johnson states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of plant]
the facility located in Dothan, Ala. I worked at this location from
[City/State]
2-24-03 to Present.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan Ala, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 24th day of February, 2007.

Vanesther Johnson
[PRINT NAME]

Vanesther Johnson
[SIGN NAME]